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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MAURICE WILLIAMSON II;

Defendant.

Case No. 2:21-cr-00129-APG-EJY

STIPULATION TO SEAL
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United States Attorney, and Joshua Brister, Assistant United States Attorney, counsel for the United States of America, and Yi Lin Zheng, counsel for Maurice Williamson II, that Mr. Williamson's sentencing memorandum and its accompanying exhibits be filed under seal.

The Stipulation is entered into for the following reasons:

1. “[T]he need to protect medical privacy qualifies as a ‘compelling reason’ for sealing records.” Williams v. Mark, 2019 WL 5102470, No. 3:17-cv-335-MMD-WGC (D. Nev. Oct. 11, 2019).

2. Mr. Williamson's sentencing memorandum exhibits are Mr. Williamson's medical records from his hospitalization at Sunrise Hospital.

3. Mr. Williamson's sentencing memorandum quotes liberally from these medical records.

1 4. Because Mr. Williamson's sentencing memorandum repeatedly highlights
2 sensitive portions of his medical records, both the memorandum and the exhibits should be
3 sealed.

4 This is the first stipulation to continue filed herein.

5 DATED: January 13, 2023.

6 By /s/ Yi Lin Zheng
7 Yi Lin Zheng
Counsel for Maurice Williamson II

JASON FRIERSON
United States Attorney

8 By /s/ Joshua Brister
9 Joshua Brister
10 Assistant United States Attorney

11 IT IS SO ORDERED:

12 Dated: January 17, 2023

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14 _____
15 ANDREW P. GORDON
16 UNITED STATES DISTRICT JUDGE